

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION

CRYSTAL GARCIA-CONTRERAS,)
 Plaintiff,)
)
 versus)
)
BROCK & SCOTT, PLLC and)
BULLHEAD INVESTMENTS, LLC,)
 Defendants.)

Civil Action No. 1:09-CV-00761

CONSENT MOTION TO STAY MEDIATION

COME NOW the Plaintiff and Defendants, each by and through their undersigned counsel, and Respectfully Move this Honorable Court that it Grant an Order to Stay Mediation of this civil action, and as cause wherefore will show that the parties have completed all discovery (including depositions of all witnesses) and have each filed potentially-dispositive motions which are now pending before the Court; and further, that the parties have been regularly in communication through their respective counsel, have made good-faith efforts to negotiate a resolution of this civil action, and notwithstanding those efforts, the parties have been unable to reach an agreement acceptable to all parties as to the resolution of this civil action. The parties, after consultation with each other, have concluded that no settlement of this action is likely to be reached until after the Court has ruled upon the motions.

Accordingly, the Plaintiff and Defendant move for entry of an Order to Stay Mediation until thirty (30) days after entry of an Order ruling upon Plaintiff's Motion for Summary Judgment and/or Defendants' Motion to Dismiss or Alternative Motion for Summary Judgment. Respectfully Submitted, this the 8th day of October, 2010.

BROCK & SCOTT, PLLC

/s/ Richard L. Jackson

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